

**In the Claims:**

Please cancel claims 13-17 without prejudice. Please amend claims 1, 11, and 12 as follows.

Sub D1  
C1 1. (Amended) An insulating material comprising one of a padding, a stuffing, and a filling material, the material comprising a non-woven blend comprising a polyester filling fibre and a cellulosic fibre obtained by an organic spinning process.

11. (Amended) Fibreballs comprising a non-woven blend comprising a polyester filling fibre and a cellulosic fibre obtained by an organic spinning process.

C2 12. (Amended) A wadding comprising a carded and layered non-woven blend comprising a polyester filling fibre and a cellulosic fibre obtained by an organic spinning process.

**REMARKS**

Claims 1-17 are pending in the application. Claim 1-17 stand rejected. Upon issuance of the above cited office action, claims 1-17 were rejected. Claims 1, 11, and 12 have been amended and claims 13-17 have been canceled. Upon entry of this amendment, claims 1-12 will be pending in the application. No new matter has been added, and no additional prior art searches are required by the amended or additional claims.

Applicant respectfully requests reconsideration of the final rejection issued by the Examiner. Applicant submits that the amendment of claim 1 did not necessitate new grounds for rejection; rather, removal of the Daniel reference initiated the new grounds for rejection. As such, Applicant has not yet had the opportunity to respond to a properly cited reference. Applicant's amendment was made purely to conform the application to United States patent practice, as was cited in the reply dated June 6, 2001. Therefore, Applicant respectfully requests removal of the final rejection and entry of the amendments described above.

**35 U.S.C. § 112 Rejection**

Claim 1 stands rejected under 35 U.S.C. § 112 as containing subject matter not described in the specification. Claims 2, 8, and 9 stand rejected as being indefinite as having no antecedent basis for "polyester". Applicant has amended claim 1 to recite polyester rather than polymer. Claim 1 now has support in the specification as originally filed, specifically in claim 1 as originally filed. Claims 2, 8, and 9 now have proper antecedent basis for "polyester." Accordingly, reconsideration of the Section 112 rejection of claims 1, 2, 8, and 9 is respectfully requested.

**35 U.S.C. § 103(a) Rejection: JP-8-170224**

Claims 1-10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over JP-8-170224 ("JP'224").

Applicant respectfully submits that independent claim 1 recites features that are neither disclosed nor suggested by JP'244. Claim 1 recites an "insulating material comprising one of a *padding, a stuffing, and a filling material*" (emphasis added). JP'244 is directed to a cellulose polymer fiber that can be dyed. JP'244 does not disclose or suggest insulating material comprising one of a padding, a stuffing, and a filling material, as recited by the claims.

As the foregoing feature of claim 1 is not disclosed in JP'244, Applicant respectfully submits that claim 1 and all claims dependent from claim 1, including claims 2-10, patentably define over the cited reference. Accordingly, reconsideration of the Section 103(a) rejection of claims 1-10 is respectfully requested.

**35 U.S.C. § 103(a) Rejection: JP-8-170224 in view of GB 1486639**

Claims 11-16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over JP-8-170224 ("JP'224") in view of GB 1486639 ("GB'639"). Claims 13-17 have been cancelled thereby obviating their rejection.

Applicant respectfully submits that claims 11 and 12 recite features that are neither disclosed nor suggested by the cited references, either alone or taken in combination. Claim 11 recites a "*fibreball*" and claim 12 recites a "*wadding*."

JP'244 is directed to a cellulose polymer fiber that can be dyed. JP'244 does not disclose or suggest a fibreball or wadding, as recited by the claims.

GB'639 is directed to a non-woven *fabric*. The non-woven fabric may include regenerated cellulose and polyamide fibres. Mixtures may also include polyester. GB'639 is directed to a *fabric* rather than a wadding or a fibreball, as recited by the claims.

As the foregoing features of claims 11 and 12 are not disclosed in either JP'244 or GB'639, Applicant respectfully submits that claims 11 and 12 patentably define over the cited reference. Accordingly, reconsideration of the Section 103(a) rejection of claims 11-12 is respectfully requested.

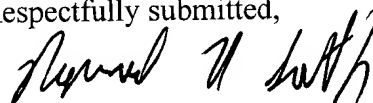
### CONCLUSION

In view of the foregoing amendments and remarks, Applicant respectfully submits that the present application is in condition for allowance. Reconsideration of the application and an early Notice of Allowance are respectfully requested. In the event that the Examiner cannot allow the present application for any reason, the Examiner is encouraged to contact the undersigned attorney, Raymond N. Scott Jr. at (215) 564-8951, to discuss resolution of any remaining issues.

Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendment. The attached page is captioned "**Version with markings to show changes made.**"

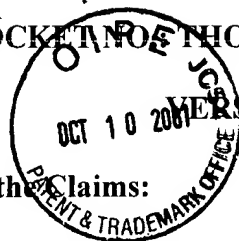
Date: 10/8/01

Respectfully submitted,



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## VERSION WITH MARKINGS TO SHOW CHANGES MADE

## In the Claims:

Claims 13-17 have been cancelled. Claims 1, 11, and 12 have been amended as follows.

1. (Amended) [A] An insulating material comprising one of a padding, a stuffing, and a filling material, the material comprising a non-woven blend comprising a [polymer] polyester filling fibre and a cellulosic fibre obtained by an organic spinning process.

11. (Amended) Fibreballs comprising a [the] non-woven blend [of claim 1] comprising a polyester filling fibre and a cellulosic fibre obtained by an organic spinning process.

12. (Amended) A wadding comprising a carded and layered non-woven blend [of claim 1] comprising a polyester filling fibre and a cellulosic fibre obtained by an organic spinning process.

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